UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Case No. 20-CR-168 (WMW/ECW)

United States of America,

Plaintiff,

vs.

MOTION FOR ATTORNEY-CONDUCTED VOIR DIRE

Montez Terriel Lee,

Defendant.

The Defendant, Montez Terriel Lee, by and through his attorney, Andrew S. Garvis, Koch & Garvis, LLC, hereby moves the Court, pursuant to FED. R. CRIM. P. 24 (a), for an Order permitting his attorney to supplement the Court's voir dire examination by further inquiring generally as to any biases, prejudices, or predispositions which a juror may have towards individuals accused of being part of a drug trafficking organization and what impact, if any, such views would have on the juror's ability to be fair and impartial. Additionally, counsel would seek permission to inquire about issues related to the defendant's race and ethnicity and any prejudices or biases of any prospective juror in those regards.

This Motion is based on the Indictment, the records and files in the above entitled action, and any and all matters which may be presented prior to or at the time of the hearing of said motion.

Respectfully submitted,

KOCH AND GARVIS, LLC

Dated: September 15, 2020

s/ Andrew S. Garvis
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